

date for local number portability from October 3, 1997 to February 7, 1998. This proposal was the subject of BellSouth's *ex parte* presentation to the Federal Communications Commission in CC Docket Number 95-116 on October 17, 1997.

37. Some parties have questioned why the end-to-end test results included in my original affidavit did not show the signature of all test participants. In most cases the product manager with day-to-day responsibilities for a given unbundled network element or resold service retained the original signature sheets as part of other test documentation. Those signature sheets for members of the end-to-end test team are attached to this affidavit as Exhibit WKM-1.
38. AT&T claims that required cross connections between unbundled network elements and a CLEC's collocation arrangement must be done on a customer-by-customer basis which would limit the number of customers that could be provisioned with UNE service in any one day. (Affidavit of Robert Falcone and Michael Leshner on behalf of AT&T at paragraph 61.) This is simply incorrect. The number of customers that could be provisioned in any given day is a function of the quantity of resources (people) AT&T chooses to assign to this work. Obviously, only AT&T can decide how many of its employees will be engaged in this task, thus the decision as to what amount of work will be completed in any given day is ultimately AT&T's to make.
39. AT&T claims that a maximum of two teams of people can work on BellSouth's Main Distribution Frame (MDF) at any one time and this would limit the amount of customer orders that could be completed in a given day. (Affidavit of Robert Falcone and Michael Leshner on behalf of AT&T at paragraph 64.) Here again, AT&T is simply incorrect. The MDF is a

physically large apparatus, often spanning an entire side of a central office building. Thus, the notion of a very constricted quantity of technicians working at the MDF simultaneously is completely unfounded. Here again, the quantity of technicians working at the MDF is a function of work to be performed rather than any limitation imposed by the physical size of the MDF.

40. AT&T claims that the risk of human error in provisioning the loop/switch combination through collocation is substantial. (Affidavit of Robert Falcone and Michael Leshner on behalf of AT&T at paragraph 68.) While there is always a risk of human error causing delays or errors during the provisioning process, the risk is no greater and no less than for similar transactions on behalf of BellSouth's retail customers. Cross connections at distribution frames have been performed for many years and the procedures are thoroughly understood by BellSouth's technicians. Just as there are required cross connections at the MDF in order to extend unbundled loops and unbundled switch ports to a CLEC's collocation arrangement, there are also cross connections at the MDF for BellSouth's retail customers. The same work steps for establishing a cross connection are required for both BellSouth's and a CLEC's end user customers. Thus, there is no basis for AT&T's claim that human error will in any way be a more substantial risk to a CLEC's customers than it is to BellSouth's retail customers.
41. AT&T claims that the methods available for providing loops served by Integrated Digital Loop Carrier (IDLC) equipment is fundamentally incompatible with BellSouth's proposal regarding a CLEC's combining unbundled loops with unbundled ports. (Affidavit of Robert Falcone and Michael Leshner on behalf of AT&T at paragraph 70-74.) One of the issues which AT&T raised during arbitration proceedings between BellSouth and

AT&T in all nine states in BellSouth's region was the issue of providing unbundled loops where such loops are served by IDLC equipment. Indeed, this issue was discussed extensively, testimony was prepared and filed, hearings conducted, and decisions made. AT&T argued during those arbitration proceedings that BellSouth be required to unbundled such loops. The outcome of those arbitrations was to require BellSouth to provide these unbundled loops by one of two methods. Those two methods are discussed earlier in this affidavit. It is interesting that AT&T now recants its earlier story and here argues against such unbundling despite its arguing for such unbundling during the arbitration proceedings. BellSouth stands ready and able to fulfill its obligations to provide these unbundled loops.

42. AT&T claims that BellSouth's use of remote switching modules effectively insulates over 100,000 BellSouth customers in Louisiana from competition. (Affidavit of Robert Falcone and Michael Leshner on behalf of AT&T at paragraph 75.) Remote switching technology has been in use in BellSouth for many years and its introduction into the modern telecommunications network stemmed from reasons of economy and service reliability rather than as a means of thwarting CLEC competitiveness. Nonetheless, despite AT&T's complaint, I am not aware of any request from AT&T to develop a means of allowing a CLEC to combine unbundled loops and unbundled switch ports in the presence of remote switching module technology. AT&T's argument seems to hinge in part on the fact that the remote switching module is located away from the BellSouth central office. Obviously, BellSouth today makes arrangements for its technicians to maintain this equipment as well as to make required cross connections for the end user customers served by that remotely located equipment. Moreover, AT&T completely fails to support its assertion that space will be a problem at these remote sites.

Instead, AT&T apparently reaches the incorrect conclusion that such combinations are not possible despite that essentially the same processes are involved for remote switching arrangements as for equivalent combinations inside a central office building. AT&T is simply wrong.

43. AT&T claims that the gauge wire used for collocation wires will be problematic given the unnecessary handling and removal of these wires as customers change service providers. (Affidavit of Robert Falcone and Michael Leshner on behalf of AT&T at paragraph 76-79.) AT&T fails to make any kind of a convincing case with its assertions here. First, the cross connection between a given unbundled switch port and a CLEC's collocation arrangement need be made only once. Switch ports are reusable in the sense that a CLEC may reuse a particular switch port for another of its customers simply by changing the associated telephone number and service features if desired. Thus, cross connections for switch ports would not be subject to the supposed inherent frailty of the 22 gauge wire. Second, 22 gauge wire has been used for central office cross connections and jumpers for many, many years. If 22 gauge wire cross connections were indeed as problematic as AT&T claims, then chronic, severe customer service interruptions would have occurred. Affected customers would have complained and surely some solution would have been reached by now. The most obvious such "solution" would be to simply use a larger gauge wire. No such "solution" has been developed simply because no such problem existed then and does not exist now. Third, the "pulling and tugging" to mine old cables that are no longer in use, which AT&T attributes to the new environment of CLECs combining unbundled loops with unbundled switch ports, has gone on for years without serious incident. Since BellSouth's own retail customers would also seemingly be put at peril by indiscriminate mining of cables, it would obviously be counterproductive for BellSouth to attempt to disadvantage a

CLEC by mining cables out of its central offices in order to increase customer service outages for CLEC customers.

44. AT&T claims that the additional loop length that would result from the cross connections between the MDF and a collocation space would change the electrical characteristics of the loop and that maintenance and testing activities would be made unreliable. (Affidavit of Robert Falcone and Michael Lesher on behalf of AT&T at paragraph 81.) The following simple example illustrates the inherent absurdity of AT&T's claim and its obviously frivolous attempt at discussing the technical issues. A given loop is served on "straight copper" (that is, without the use of Digital Loop Carrier equipment ) and is two and one half miles long (roughly 12,000 feet). This unbundled loop is cross connected to a CLEC's collocation arrangement using 50 feet of 22 gauge wire. The cross connection thus represents four tenths of one percent of the overall loop length (0.4%). Surely, AT&T does not seriously believe that such an insignificant change to the loop length would have any perceivable impact either on customer service or on BellSouth's ability to properly test its facilities.
45. MCI claims BellSouth's not providing MCI with a list of BellSouth's local switches sub-tending BellSouth's local tandems has frustrated MCI's efforts to plan for interconnection. (Declaration of Marcel Henry on behalf of MCI at paragraph 9.) BellSouth has provided the information MCI requested for BellSouth's local tandems. One of those tandems, BellSouth's East Point Tandem in Georgia, was being officially renamed in the Bell Communications Research (Bellcore) Local Exchange Routing Guide (LERG) and, as a result of that updating, BellSouth's query for the LERG data returned unreliable results. BellSouth has since completed the database update and has provided MCI with the requested information for the East Point local tandem as well.

I hereby swear that the foregoing is true and correct to the best of my information and belief.



W. Keith Milner

Director-Interconnection Operations

BellSouth Telecommunications, Inc.

Subscribed and sworn to before me this 16<sup>th</sup>  
day of December, 1997.



Notary Public

**TERESA L. ROCKWELL**  
Notary Public, Gwinnett County, Georgia  
My Commission Expires October 28, 2001

WKM-1

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**TAB 1**

**END-TO-END TEST RESULTS  
IMPLEMENTATION TEAM SIGN-OFF SHEET**

Product/Service      Unbundled Dark Fiber

**END-TO-END TEST RESULTS:**

Completion Date      03-31-97

We the undersigned agree we have fully tested this product/service and are satisfied it is functional and ready for deployment.

	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Completion</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	<u>Nancy Starcher</u>
Project Mgmt.	CURTIS SWAN	205 444-524	_____
ICS	BEVERLY SCARBROUGH	205 977-0111	_____
CBS	SALLY BELUE	205 321-4422	_____
Network	BILL MCALLISTER	205 977-2710	_____
Network	BRIAN BLANCHARD	205 977-3064	_____
ACAC	ED HOUPPERT	404 529-7206	_____
Comptrollers	SUSAN FURLOW	205 985-8018	_____
RSOS	RON LOVE	404 529-5822	<u>Ron Love</u>
RSOS	DONNA WARD	404 529-6112	<u>Donna Ward</u>

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# DARK FIBER

	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Completion</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	_____
Project Mgmt.	CURTIS SWAN	205 444-524	_____
ICS	BEVERLY SCARBROUGH	205 977-0111	_____
CBS	SALLY BELUE	205 321-4422	_____
Network	BILL MCALLISTER	205 977-2710	_____
Network	BRIAN BLANCHARD	205 977-3064	_____
ACAC	ED HOUPPERT	404 529-7208	<i>Ed Houppert</i>
Comptrollers	SUSAN FURLOW	205 985-8018	_____
RSOS	RON LOVE	404 529-5822	_____
RSOS	DONNA WARD	404 529-6112	_____

3/28/97

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at <u>Completion</u>	Participants <u>Name (Typed)</u>	Telephone <u>Number</u>	Signature <u>ETET</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	
Project Mgmt.	CURTIS SWAN	205 444-524	
ICS	BEVERLY SCARBROUGH	205 977-0111	
CBS	SALLY BELUE	205 321-4422	
Network 	BILL MCALLISTER	205 977-2710	
Network	BRIAN BLANCHARD	205 977-3064	
ACAC	ED HOUPPERT	404 529-7206	
Comptrollers	SUSAN FURLOW	205 985-8018	
RSOS	RON LOVE	404 529-5822	
RSOS	DONNA WARD	404 529-6112	

**TAB 2**

**END-TO-END TEST RESULTS  
IMPLEMENTATION TEAM SIGN-OFF SHEET**

Product/Service Unbundled Interoffice Transport -Dedicated

**END-TO-END TEST RESULTS**

Completion Date 03-27-97

We the undersigned agree we have fully tested this product/service and are satisfied it is functional and ready for deployment.

	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Completion</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	<u>Nancy Starcher</u>
Project Mgmt.	CURTIS SWAN	205 444-524	_____
ICS	BEVERLY SCARBROUGH	205 977-0111	_____
CBS	SALLY BELUE	205 321-4422	_____
Network	BILL MCALLISTER	205 977-2710	_____
Network	BRIAN BLANCHARD	205 977-3064	_____
ACAC	ED HOUPPERT	404 529-7206	_____
Comptrollers	SUSAN FURLOW	205 985-8018	_____
RSOS	RON LOVE	404 529-5822	<u>Ron Love</u>
RSOS	DONNA WARD	404 529-6112	<u>Donna Ward</u>

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	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Complet</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	
Project Mgmt.	CURTIS SWAN	205 444-524	<i>Curtis Swan</i>
ICS	BEVERLY SCARBROUGH	205 977-0111	<i>Beverly Scarbrough</i>
CBS	SALLY BELUE	205 321-4422	<i>Sally Belue</i>
Network	BILL MCALLISTER	205 977-2710	
Network <i>Operations</i> <i>CPG</i>	BRIAN BLANCHARD	205 977-3064	<i>Brian Blanchard</i>
ACAC	ED HOUPPERT	404 529-7206	
<i>IT-CABS</i> <i>Comptrollers</i>	SUSAN FURLOW	205 985-8018	<i>Susan F. Furlow</i>
RSOS	RON LOVE	404 529-5822	
RSOS	DONNA WARD	404 529-6112	

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# UIT Dedicated

	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Completion</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	_____
Project Mgmt.	CURTIS SWAN	205 444-524	_____
ICS	BEVERLY SCARBROUGH	205 977-0111	_____
CBS	SALLY BELUE	205 321-4422	_____
Network	BILL MCALLISTER	205 977-2710	_____
Network	BRIAN BLANCHARD	205 977-3084	_____
ACAC	ED HOUPPERT	404 529-7208	<i>Ed Houppert</i>
Comptrollers	SUSAN FURLOW	205 985-8018	_____
RSOS	RON LOVE	404 529-5822	_____
RSOS	DONNA WARD	404 529-6112	_____

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at <u>Completion</u>	Participants <u>Name (Typed)</u>	Telephone <u>Number</u>	Signature <u>ETET</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	
Project Mgmt.	CURTIS SWAN	205 444-524	
ICS	BEVERLY SCARBROUGH	205 977-0111	
CBS	SALLY BELUE	205 321-4422	
Network <i>Bryan</i>	BILL MCALLISTER	205 977-2710	
Network	BRIAN BLANCHARD	205 977-3064	
ACAC	ED HOUPPERT	404 529-7206	
Comptrollers	SUSAN FURLOW	205 985-8018	
RSOS	RON LOVE	404 529-5822	
RSOS	DONNA WARD	404 529-6112	

# TAB 3

**END-TO-END TEST RESULTS  
IMPLEMENTATION TEAM SIGN-OFF SHEET**

Product/Service    Unbundled Channelization, incld Channel Interface

**END-TO-END TEST RESULTS**

Completion Date    03-27-97

We the undersigned agree we have fully tested this product/service and are satisfied it is functional and ready for deployment.

	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Completion</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	<u>Nancy Starcher</u>
Project Mgmt.	CURTIS SWAN	205 444-524	_____
ICS	BEVERLY SCARBROUGH	205 977-0111	_____
CBS	SALLY BELUE	205 321-4422	_____
Network	BILL MCALLISTER	205 977-2710	_____
Network	BRIAN BLANCHARD	205 977-3064	_____
ACAC	ED HOUPPERT	404 529-7206	_____
Comptrollers	SUSAN FURLOW	205 985-8018	_____
RSOS	RON LOVE	404 529-5822	<u>Ron Love</u>
RSOS	DONNA WARD	404 529-6112	<u>Donna Ward</u>

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	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Completion</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	
Project Mgmt.	CURTIS SWAN	205 444-524	<i>Curtis Swan</i>
ICS	BEVERLY SCARBROUGH	205 977-0111	<i>Beverly Scarbrough</i>
CBS	SALLY BELUE	205 321-4422	<i>Sally Belue</i>
Network	BILL MCALLISTER	205 977-2710	
Network Operations <i>CPG</i>	BRIAN BLANCHARD	205 977-3064	<i>Brian Blanchard</i>
ACAC	ED HOUPPERT	404 529-7206	
<del>IT-CABS Comptrollers</del>	SUSAN FURLOW	205 985-8018	<i>Susan R. Furlow</i>
RSOS	RON LOVE	404 529-5822	
RSOS	DONNA WARD	404 529-6112	

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at  
Completion  
 Product Mgmt.

---

Participants  
Name (Typed)

Telephone  
Number

Signature  
EIEI

NANCY STARCHER 404 927-7501

---

Project Mgmt. CURTIS SWAN 205 444-524

---

ICS BEVERLY SCARBROUGH 205 977-0111

---

CBS SALLY BELUE 205 321-4422

---

Network ~~BILL MCALLISTER~~ 205 977-2710

---

Network BRIAN BLANCHARD 205 977-3064

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ACAC ED HOUPPERT 404 529-7206

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Comptrollers SUSAN FURLOW 205 985-8018

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RSOS RON LOVE 404 529-5822

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RSOS DONNA WARD 404 529-6112

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*UIT Channelized*

	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Completion</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	_____
Project Mgmt.	CURTIS SWAN	205 444-524	_____
ICS	BEVERLY SCARBROUGH	205 977-0111	_____
CBS	SALLY BELUE	205 321-4422	_____
Network	BILL MCALLISTER	205 977-2710	_____
Network	BRIAN BLANCHARD	205 977-3064	_____
ACAC	ED HOUPPERT	404 529-7206	<i>Edward Houppert</i>
Comptrollers	SUSAN FURLOW	205 985-8018	_____
RSOS	RON LOVE	404 529-5822	_____
RSOS	DONNA WARD	404 529-5112	_____

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